

BRAFMAN & ASSOCIATES, P.C.

ATTORNEYS AT LAW

767 THIRD AVENUE, 26TH FLOOR
NEW YORK, NEW YORK 10017
TELEPHONE: (212) 750-7800
FACSIMILE: (212) 750-3906
E-MAIL: ATTORNEYS@BRAFLAW.COM

BENJAMIN BRAFMAN

MARK M. BAKER
OF COUNSEL

MARC A. AGNIFILO
OF COUNSEL

ANDREA L. ZELLAN
JOSHUA D. KIRSHNER
JACOB KAPLAN
TENY R. GERAGOS
ADMITTED IN NY & CA
STUART GOLD

April 7, 2019

VIA ECF

The Honorable Nicholas G. Garaufis
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Raniere, 18 Cr. 204 (NGG)

Dear Judge Garaufis:

To the extent that any co-defendant of Keith Raniere's has an agreement with the government to resolve her case with a guilty plea in advance of trial, defendant Raniere requests that any such co-defendant not be presented to the jury during tomorrow's jury selection process as a trial participant. It would be clearly prejudicial to Mr. Raniere or any defendant going to trial to have the jury know that another co-defendant introduced as a trial participant has in fact pleaded guilty between jury selection and opening statements. It would be even more prejudicial to have a co-defendant introduced to the jury as a trial participant and later have that same person appear as a government witness. To avoid these completely avoidable situations, we propose that as to any co-defendant who has an agreement in principal to plead guilty, such co-defendant be included in the list of names for the jury's consideration along with all the other potential witnesses and other persons in the case, but that such co-defendant not sit at counsel table and that such person not presented to the jury as an active participant at the upcoming trial.

Thank you for your consideration.

Respectfully submitted,



Marc A. Agnifilo
Teny R. Geragos

cc: All Counsel (via ECF)